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Hearing date: November 30, 2006, 10:00 a.m.

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Re)	CASE NO. 05-44481 (RDD)
)	
)	Chapter 11
)	
DELPHI CORPORATION, et al.)	DATE: November 30, 2006
)	TIME: 10:00 a.m.
)	ROOM: 610
Debtor.)	

JOINDER BY TECHNOLOGY PROPERTIES, LTD. IN OPPOSITION FILED BY CADENCE
INNOVATION LLC, and OBJECTION TO PROPOSED TO CLAIMS-ESTIMATION
PROCESS SET FORTH IN DEBTORS' MOTION FOR ESTABLISHING CERTAIN
NOTICES AND PROCEDURES GOVERNING HEARING REGARDING DISALLOWANCE
OR ESTIMATION OF CLAIM

1. Technology Properties, Ltd. hereby joins in the opposition filed by Cadence
Innovation LLC ("Cadence") on November 22, 2006, fully titled: "Limited Objection of Cadence

Innovations, LLC to Debtors' Motion For Order Pursuant to 11 U.S.C. § 502(B) and 502(C) and Fed.R.Bankr. P. 2002(M), 3007, 7016, 7026, 9006, 9007 and 9014 Establishing (I) Dates for Hearings Regarding Disallowance or Estimations of Claims and (II) certain Notices and Procedures Governing Hearings Regarding Disallowance or Estimation of Claims" (The "Cadence Opposition".) A true and correct copy of the Cadence Opposition, without the exhibits, is attached hereto for the Court's convenience.

2. TPL, as Cadence, has filed a claim against Delphi and its related bankrupt companies arising from allegations of patent infringement. As is set forth in Section III of the Cadence Opposition, the "estimation" process proposed by Delphi is inadequate to the point of being arbitrary. The proposal denies all due process to the claimant and is entirely inappropriate to determining the claims that require extensive discovery and complex scientific analysis. Indeed, the summary nature of the procedure would injure TPL to a greater extent than Cadence, which has had the benefit of four years of pre-petition litigation and its discovery. TPL has not yet started the litigation process. The Cadence Opposition sets forth detailed arguments why the proposed estimation procedures must be denied as to a patent infringement claim, including 1) the denial of due process; 2) the failure by the Debtor to establish the need for estimation; 3) the attempt to estimate the claim for all purposes; and 4) the denial of the right under 502(j) of the Bankruptcy Code for reconsideration of a claim. TPL incorporates the Cadence Opposition herein as though fully set forth.

3. TPL filed a full response to the Debtor's objections to TPL's claims as included in the Debtor's Third Omnibus Objection to Claims. TPL's response included an objection to the

estimation process. Only on November 27th, however, was TPL informed that the hearing on the objection to TPL's claims would not go forward, while the hearing on the motion for the claims-estimation would proceed. Thus it was appropriate to set forth this opposition separately.

WHEREFORE, TPL respectfully requests that the Court deny, in its entirety, the Debtors motion in respect of the TPL claims, and grant such other relief that is just and proper.

Respectfully submitted this 27th day of November, 2006

BINDER & MALTER, LLP

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